

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-5 and 8-21 are pending in the application, with claims 1 and 11 being the independent claims. Claims 6 and 7 are sought to be canceled without prejudice to or disclaimer of the subject matter therein. Claims 1-5, 11, and 14-18 are sought to be amended. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Rejections Under 35 U.S.C. § 102

Zhu

Claims 1, 2, 6, and 8-10 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,344,852 to Zhu *et al.* (hereinafter "Zhu"). (*See*, Office Action at p. 2.)

Regarding claim 6, Applicants have canceled this claim without prejudice to or disclaimer of the subject matter therein, thereby rendering this rejection moot.

Regarding claims 1, 2, and 8-10, Applicants respectfully traverse these rejections.

Amended independent claim 1 recites (emphasis added), *inter alia*, "defining the geometry chunk with a bounding region ***when said bounding region has not already***

been defined for the geometry chunk in a previous frame[.]" This feature is supported at paragraph 0067 of the specification of the instant patent application, which states, *inter alia*:

At a step 608, geometry distributor 102 looks at one of the geometry chunks in the frame and determines whether a bounding region exists for that particular geometry chunk. Once the present invention creates a bounding region for a geometry chunk, the bounding region is stored for future frames that may require the same geometry chunk to be rendered.

Zhu does not disclose, teach, or suggest this feature. The Office Action contends that this feature is taught at column 3, lines 43-52 of Zhu. (*See*, Office Action at p. 3.) Column 3, lines 43-52 of Zhu state:

A binning engine 12, which is implemented in hardware (preferably an ASIC) separate from a host computer, receives the graphics data (comprising geometry and mode data). Using the graphics data, binning engine 12 virtually reproduces the associated geometries and modes in an image frame which comprises a number of distinct regions referred to as tiles (FIG. 3). Binning engine 12 determines which tiles are "touched" by each geometry. For every tile, the graphics data for each geometry touching the tile is linked to the tile. This linked data is output by binning engine 12 in the form of data packets 14, each data packet 14 specific to a particular tile.

This passage does not teach "defining the geometry chunk with a bounding region when said bounding region has not already been defined for the geometry chunk in a previous frame[.]" Thus, amended independent claim 1 is not anticipated by Zhu. Likewise, claims 2 and 8-10, which depend from claim 1, are also not anticipated by Zhu. Therefore, Applicants respectfully request that the Examiner reconsider claims 1, 2, and 8-10 and remove the rejections of these claims under 35 U.S.C. § 102(e) with respect to Zhu.

Rich

Claims 1, 3-5, 7, 8, 11, and 15-19 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,104,842 to Rich (hereinafter "Rich"). (*See*, Office Action at p. 4.)

Regarding claim 7, Applicants have canceled this claim without prejudice to or disclaimer of the subject matter therein, thereby rendering this rejection moot.

Regarding claims 1, 3-5, 8, 11, and 15-19, Applicants respectfully traverse these rejections.

As stated above, amended independent claim 1 recites (emphasis added), *inter alia*, "defining the geometry chunk with a bounding region ***when said bounding region has not already been defined for the geometry chunk in a previous frame[.]***" Independent claim 11 has been amended in a similar manner. Rich does not disclose, teach, or suggest this feature. Thus, amended independent claims 1 and 11 are not anticipated by Rich. Likewise, claims 3-5, 8, and 15-19, which depend from claims 1 or 11, are also not anticipated by Rich. Therefore, Applicants respectfully request that the Examiner reconsider claims 1, 3-5, 8, 11, and 15-19 and remove the rejections of these claims under 35 U.S.C. § 102(b) with respect to Rich.

Rejections Under 35 U.S.C. § 103

Claims 11-14, 20, and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Zhu. (*See*, Office Action at p. 7.) Applicants respectfully traverse these rejections. As noted above, amended independent claim 11 recites (emphasis

added), *inter alia*, "a geometry distributor that defines a bounding region for the geometry chunk ***when said bounding region has not already been defined for the geometry chunk in a previous frame***[" As stated above, Zhu does not disclose, teach, or suggest this feature. Thus, amended independent claim 11 is patentable over Zhu. Likewise, claims 12-14, 20, and 21, which depend from claim 11, are also patentable over Zhu. Therefore, Applicants respectfully request that the Examiner reconsider claims 11-14, 20, and 21 and remove the rejections of these claims under 35 U.S.C. § 103(a) with respect to Zhu.

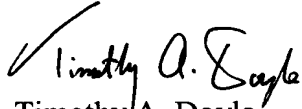
Conclusion

All of the stated grounds of rejection have been properly traversed or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully
requested.

Respectfully submitted,

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Handwritten signature of Timothy A. Doyle in black ink.

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